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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

LUIS LOPEZ, an individual

Plaintiff,

vs.

RAYMOND JOSEPH NOGERA, and individual;  
KEY INSURANCE COMPANY, a foreign  
corporation; MED JAMES, INC., a foreign  
corporation; DOES I through X; and ROE  
LEGAL ENTITIES I through X,

Defendants.

CASE NO. 2:25-cv-00721-RFB-MDC

**STIPULATION AND ORDER TO  
EXTEND TIME REGARDING  
DEFENDANT MED JAMES, INC.'S  
REPLIES TO PLAINTIFF'S  
OPPOSITIONS TO MOTIONS TO  
DISMISS**

(First Request)

Plaintiff, Luis Lopez ("Plaintiff") and Defendant, Med James, Inc. ("MJ")<sup>1</sup>, by and through their undersigned attorneys, hereby stipulate and agree as follows regarding the briefing schedule in connection with MJ's Motion to Dismiss for Lack of Personal Jurisdiction (ECF 4) and Motion to Dismiss for (1) Failure to State a Claim; and (2) Lack of Subject Matter Jurisdiction (ECF 5) (the "Motions"), both of which were filed on May 6, 2025:

1. Plaintiff's Opposition to MJ's Motion to Dismiss For: (1) Failure to State a Claim; and (2) Lack of Subject Matter Jurisdiction (ECF 8) was filed on May 20, 2025.

MJ's Reply, currently due by May 27, 2025, is now due on May 30, 2025;

<sup>1</sup> Defendants Raymond Joseph Nogera and Key Insurance Company have not appeared in this action.

2. Plaintiff's Opposition to MJJ's Motion to Dismiss for Lack of Personal Jurisdiction (ECF 9) was filed on May 20, 2025. MJJ's Reply, currently due by May 27, 2025, is now due on May 30, 2025;
3. This is the first request of extension of time regarding the briefing related to MJJ's Motions.
4. Good cause for this extension exists because there are numerous issues raised in the briefing and additional time is needed to sufficiently address these issues due to the Memorial Day holiday on Monday, May 26, 2025. Additionally, MJJ's counsel has a medical procedure scheduled for Wednesday, May 28, 2025, for which he needs to be sedated.

DATED this 23rd day of May 2025

**REISMAN SOROKAC**

/s/ Joshua H. Reisman, Esq.

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DATED this 23rd day of May 2025

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IT IS SO ORDERED.



UNITED STATES DISTRICT COURT JUDGE

DATED: 05/28/2025

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